

**Lesaka Technologies Proprietary Limited  
and its subsidiaries**

(hereinafter referred to as “Lesaka”)

(Registration no.: 2002/031446/07)

**PROTECTION OF PERSONAL INFORMATION POLICY**

## CONTENTS

1.	EXECUTIVE SUMMARY .....	3
2.	OBJECTIVE .....	4
3.	SCOPE .....	4
4.	STATEMENT .....	5
5.	DEFINITIONS.....	5
6.	RIGHTS OF DATA SUBJECTS .....	7
6.1.	RIGHT OF ACCESS .....	7
6.2.	RIGHT TO CORRECTION OR DELETION .....	7
6.3.	RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION .....	7
6.4.	RIGHT TO OBJECT TO DIRECT MARKETING.....	8
6.5.	RIGHT TO COMPLAIN .....	8
6.6.	RIGHT TO BE INFORMED .....	8
6.7.	CONTACT DETAILS.....	8
7.	EIGHT PRINCIPLES OF POPIA.....	9
7.1.	ACCOUNTABILITY .....	9
7.2.	PROCESSING LIMITATION .....	9
7.3.	PURPOSE SPECIFICATION.....	10
7.4.	FUTHER PROCESSING LIMITATION .....	11
7.5.	INFORMATION QUALITY.....	11
7.6.	OPENESS.....	11
7.7.	SECURITY SAFEGUARDS .....	11
7.9.	DATA SUBJECT PARTICIPATION .....	12
8.	PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES.....	12
9.	RETENTION OF RECORDS .....	12
10.	DATA BREACHES .....	13
11.	WEBSITE COOKIES.....	13
12.	DUTIES AND RESPONSIBILITIES .....	13
12.1.	LESAKA BOARD AND INFORMATION OFFICER.....	13
12.2.	INFORMATION TECHNOLOGY (IT) DEPARTMENT .....	14
12.3.	MARKETING DEPARTMENT .....	15
12.4.	EMPLOYEES AND OTHER PERSONS ACTING ON BEHALF OF LESAKA.....	15
13.	RECORDS HELD BY LESAKA.....	16
14.	POLICY REVIEW .....	18
	ANNEXURE A – PERSONAL INFORMATION REQUEST FORM.....	19
	ANNEXURE B – POPIA COMPLAINT FORM.....	21

Approved by: Lesaka Board	Last revision date: March 2023 Version: 4	Date of next review: July 2023	Page 2 of 22
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## 1. EXECUTIVE SUMMARY

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The right to privacy is an integral human right recognised and protected in the South African Constitution and is endorsed by the Protection of Personal Information Act 4 of 2013 ("POPIA") and the Promotion of Access to Information Act 2 of 2000 (PAIA).

POPIA aims to promote the protection of privacy by providing eight guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Through the rendering or provision of financial services and payment solutions and other related services, Lesaka is involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees, and other stakeholders.

Given the importance of privacy, Lesaka is committed to effectively managing personal information in accordance with the provisions of POPIA and PAIA.

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## 2. OBJECTIVE

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This objective of this policy is to protect Lesaka from the compliance risks associated with the protection of personal information which includes:

- Breaches of confidentiality
- Failing to offer a choice
- Reputational damage

This policy demonstrates Lesaka's commitment to protecting the privacy rights of data subjects in the following manner:

- Through stating desired behaviour and directing compliance with the provisions of POPIA including best practice standard
- By cultivating an organisational culture that recognises privacy as a valuable human right.
- By developing and implementing internal controls for the purpose of managing the compliance risk associated POPIA.
- By creating business practices that will provide reasonable assurance that the rights of data subjects are protected and balanced with the legitimate business needs of Lesaka.
- By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and where necessary, Deputy Information Officers in order to protect the interests of Lesaka and data subjects.
- By raising awareness through training and providing guidance to individuals who process personal information so that they can act confidently and consistently.

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## 3. SCOPE

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This policy is relevant to Lesaka specifically all:

- Lesaka's governing body;
- Branches, business units and subsidiaries of Lesaka;
- Employees and independent contractors;
- Clients;
- Customers; and
- Suppliers and any other persons acting on behalf of Lesaka.

The branches, business units and subsidiaries of Lesaka to which this policy applies includes:

- Net1 Finance Holdings (Pty) Ltd;
- Prism Holdings (Pty) Ltd;
- Net1 Universal Electronic Technological Solutions (Pty) Ltd;
- Net1 Mobile Solutions (Pty) Ltd;
- Moneyline Financial Services (Pty) Ltd;
- Manje Mobile Electronic Services (Pty) Ltd;
- Prism Payment Technologies (Pty) Ltd;
- RMT Systems (Pty) Ltd; and
- EasyPay (Pty) Ltd.

Any reference to " Lesaka " will include the above list of branches, business units and subsidiaries unless indicated otherwise.

Note: The Connect Group of Companies have their own policies, which will be reviewed by Lesaka and aligned as required.

Approved by: Lesaka Board	Last revision date: March 2023 Version: 4	Date of next review: July 2023	Page 4 of 22
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POPIA does not apply in situations where the processing of personal information:

- is concluded in the course of purely personal or household activities, or
- where the personal information has been de-identified.

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#### 4. STATEMENT

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- This policy forms part of the Lesaka's internal business processes and procedures.
- Lesaka's governing body, its employees, volunteers, contractors, suppliers, and any other persons acting on behalf of Lesaka are required to familiarise themselves with the policy's requirements and undertake to comply with the stated processes and procedures.
- Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

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#### 5. DEFINITIONS

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- **Biometrics:** Means a technique of personal identification that is based on physical, physiological, or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning, and voice recognition.
- **Consent:** Means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.
- **Data Subject:** This refers to the natural or juristic person to whom personal information relates, such as a client, customer, employees, or a company that supplies Lesaka with products or other goods.
- **De-Identify:** This means to delete any information that identifies a data subject, or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies the data subject.
- **Direct Marketing:** Means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:
  - Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
  - Requesting the data subject to donate any kind for any reason.
- **Filing System:** Means any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria.
- **Information Officer:** The Information Officer is responsible for ensuring Lesaka's compliance with POPIA.  
Where no Information Officer is appointed, the head of Lesaka will be responsible for performing the Information Officer's duties. Once appointed, the Information Officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties. Deputy Information Officers can also be appointed to assist the Information Officer.
- **Information Regulator:** Means the Regulatory body established in terms of s.39 of POPIA.
- **Processing:** The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:
  - the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
  - dissemination by means of transmission, distribution or making available in any other form; or
  - merging, linking, as well as any restriction, degradation, erasure, or destruction of information.
- **Record:** Means any recorded information, regardless of form or medium, including:
  - Writing on any material;

- Information produced, recorded, or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded, or stored;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph, or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.
- **Responsible Party:** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. In this case, Lesaka is the responsible party.
- **Operator:** An operator means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party. For example, a third-party service provider that has contracted with Lesaka to shred documents containing personal information. When dealing with an operator, it is considered good practice for a responsible party to include an indemnity clause.
- **Personal Information:** Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:
  - race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, and birth of a person;
  - information relating to the education or the medical, financial, criminal or employment history of the person;
  - any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
  - the biometric information of the person;
  - the personal opinions, views, or preferences of the person;
  - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
  - the views or opinions of another individual about the person;
  - the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

This policy applies to personal information collected by Lesaka in connection with the goods and services which Lesaka provides and offers. This includes information collected directly from you as a data subject, as well as information we collect indirectly through our service providers who collect your information on our behalf.

This privacy policy does not apply to the information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that Lesaka does not manage or employ. These third party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

Approved by: Lesaka Board	Last revision date: March 2023 Version: 4	Date of next review: July 2023	Page 6 of 22
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## 6. RIGHTS OF DATA SUBJECTS

Where appropriate, Lesaka will ensure that its clients and customers are made aware of the rights conferred upon them as data subjects. Lesaka will ensure that it gives effect to the following rights listed below. To exercise any of the below rights, please submit all requests or forms using the details provided in paragraph 6.7 to Lesaka 's Information Officer.

### 6.1. RIGHT OF ACCESS

Lesaka recognises that a data subject has the right to establish whether Lesaka holds personal information related to him, her or it, including the right to request access to that personal information. POPIA read with the relevant provisions of PAIA confers certain access rights on data subjects. The Lesaka PAIA Manual can be found <https://www.lesakatech.com/legal> ("**PAIA Manual**").

A data subject, having provided adequate proof of identity, has the right to: (i) request a responsible party to confirm whether any personal information is held about the data subject; and/or (ii) request from a responsible party a description of the personal information held by the responsible party including information about third parties who have or have had access to the personal information. A data subject may request:

- Lesaka to confirm, free of charge, whether it holds any personal information about him/her/it; and
- to obtain from Lesaka the record or description of personal information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the personal information. Such record or description is to be provided: (a) within a reasonable time; and (b) in a reasonable manner and format and in a form that is generally understandable.

The Lesaka "Personal Information Request Form" attached as Annexure A must be used in order to fulfil the right to access outlined above.

### 6.2. RIGHT TO CORRECTION OR DELETION

The data subject has the right to request, where necessary, that his, her or its personal information must be corrected or deleted where Lesaka is no longer authorised to retain the personal information or where its personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

On receipt of such a request, Lesaka is required to, as soon as is reasonably practicable:

- correct the information;
- delete or destroy the information;
- provide the data subject with evidence in support of the information; or
- where the data subject and responsible party cannot reach agreement on the request and if the data subject requests this, Lesaka will take reasonable steps to attach to the information an indication that correction has been requested but has not been made.

### 6.3. RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION

The data subject has the right, on reasonable grounds, to object to the processing of his, her or its personal information. In such circumstances, Lesaka will give due consideration to the request and the requirements of POPIA. Lesaka may cease to use or disclose the data subject's personal information and may, subject to any statutory and contractual record keeping requirements, also approve the destruction of the personal information.

#### 6.4. RIGHT TO OBJECT TO DIRECT MARKETING

The data subject has the right to object to the processing of his, her or its personal information for purposes of direct marketing by means of unsolicited electronic communication.

#### 6.5. RIGHT TO COMPLAIN

The data subject has the right to submit a complaint regarding an alleged infringement of any of the rights protected under POPIA. Lesaka takes all complaints seriously and will address all complaints accordingly.

The data subject also has the right to submit a complaint directly to the Information Regulator (Website: <https://inforegulator.org.za> and email address: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za) where they allege an infringement of any of their privacy rights. Lesaka "POPIA Complaint Form" attached as [Annexure B](#).

#### 6.6. RIGHT TO BE INFORMED

The data subject has the right to be notified that his, her or its personal information is being collected by Lesaka.

The data subject also has the right to be notified in any situation where Lesaka has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person.

#### 6.7. CONTACT DETAILS

All comments, questions, concerns or complaints regarding your Personal Information or this policy, should be forwarded to our information office, Lincoln Camagu Mali. .

- Tel: 011 343 2000/ 2120
- Address: President Place, 6<sup>th</sup> Floor, West Wing, Cnr. Jan Smuts Avenue & Bolton Road, Rosebank, South Africa
- Postal: P.O. Box 2424, Parklands, 2121
- Email: [popicompliance@net1.com](mailto:popicompliance@net1.com)

## 7. EIGHT PRINCIPLES OF POPIA

All employees and persons acting on behalf of Lesaka will at all times be subject to, and act in accordance with, the following principles of POPIA:

### 7.1. ACCOUNTABILITY

Lesaka will ensure that the provisions of POPIA and the guiding principles outlined in this policy are complied with through the encouragement of desired behaviour. However, Lesaka will take appropriate actions, which may include disciplinary action, against those individuals who through their intentional or negligent actions and/or omissions fail to comply with the principles and responsibilities outlined in this policy.

### 7.2. PROCESSING LIMITATION

Lesaka will ensure that personal information under its control is processed:

- in a fair, lawful, and non-excessive manner, and
- only with the informed consent of the data subject, and
- only for a specifically defined purpose.

Lesaka will inform the data subject of the reasons for collecting his, her or its personal information and obtain written consent prior to processing personal information.

Where applicable, the data subject must be informed of the possibility that their personal information will be shared with other aspects of Lesaka's business and be provided with the reasons for doing so.

Where Lesaka is the responsible party, it will only process a data subject's personal information (other than for special personal information) where:

- consent of the data subject (or a competent person, where the data subject is a child) is obtained;
- processing is necessary to carry out the actions for conclusion of a contract to which a data subject is party;
- processing complies with an obligation imposed by law on Lesaka;
- processing protects a legitimate interest of the data subject; and/or
- processing is necessary for pursuing the legitimate interests of Lesaka or of a third party to whom the information is supplied.

Lesaka will only process personal information where one of the legal bases referred to above are present.

Where required (i.e., where we are not relying on a legal ground listed above), Lesaka will obtain the data subject's consent prior to collecting, and in any case prior to using or disclosing, the personal information for any purpose.

Lesaka will make the manner and reason for which the personal information will be processed clear to the data subject.

Where Lesaka is relying on a data subject's consent as the legal basis for processing personal information, the data subject may withdraw his/her/its consent or may object to Lesaka's processing of the personal information at any time. However, this will not affect the lawfulness of any processing carried out prior to the withdrawal of consent or any processing justified by any other legal ground provided under POPIA.

If the consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, Lesaka will ensure that the personal information is no longer processed.

Special personal information is sensitive personal information of a data subject and Lesaka acknowledges that it will generally not process special personal information unless:

- processing is carried out in accordance with the data subject's consent;
- processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- processing is for historical, statistical or research purposes, subject to stipulated safeguards;
- information has deliberately been made public by the data subject; or
- specific authorisation applies in terms of POPIA.

Lesaka acknowledges that it may not process any personal information concerning a child and will only do so where it has obtained the consent of the parent or guardian of that child or where it is permitted to do so in accordance with applicable laws.

### 7.3. PURPOSE SPECIFICATION

Lesaka's business units and operations must be informed by the principle of transparency. Lesaka will process personal information only for specific, explicitly defined, and legitimate reasons. Lesaka will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.

Lesaka will generally use personal information for purposes required to operate and manage its normal business operations and these purposes include one or more of the following non-exhaustive purposes:

- for the purposes of providing its products or services to customers;
- for purposes of onboarding suppliers as approved suppliers of Lesaka. For this purpose, Lesaka will also process a supplier's personal information for purposes of performing credit checks, and this may include engaging third party credit vetting agencies;
- for purposes of monitoring the use of Lesaka 's electronic systems and online platforms. Lesaka will, from time to time, engage third party service providers (who will process the data subject's personal information on behalf of Lesaka) to facilitate this;
- for purposes of monitoring the use of our relevant websites and mobile applications generally for the purpose of improving the functionality and performance of same;
- for purposes of preventing, discovering and investigating non-compliance with this policy and other Lesaka policies, and investigating fraud, or other related matters;
- in connection with the execution of payment processing functions, including payment of Lesaka suppliers' invoices;
- to provide a service to Lesaka customers in terms of relevant services agreements;
- for employment-related purposes such as recruitment, administering payroll and carrying out background checks;
- in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
- in connection with external audit purposes. For this purpose, Lesaka engages external service providers and, in so doing, shares personal information of the data subjects with third parties;
- to respond to any correspondence that Lesaka commercial customers may send to Lesaka, including via email or by telephone;
- to contact the data subject for direct marketing purposes subject to the provisions of section 8 below;
- in order to address customer complaints in respect of Lesaka 's products and services;
- for such other purposes to which the data subject may consent from time to time; and

- for such other purposes as authorised in terms of applicable law.

#### **7.4. FUTURE PROCESSING LIMITATION**

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose or consent has been obtained to further processing.

#### **7.5. INFORMATION QUALITY**

Lesaka will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.

Where personal information is collected or received from third parties, Lesaka will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or by way of independent sources.

Lesaka may not always expressly request the data subject to verify and update his/her/its personal information unless this process is specifically necessary.

Lesaka, however, expects that the data subject will notify Lesaka from time to time in writing of any updates required in respect of his/her/its personal information.

#### **7.6. OPENESS**

Lesaka will take reasonable steps to ensure that data subjects are notified, made aware that their personal information is being collected including the purpose for which it is being collected and processed.

#### **7.7. SECURITY SAFEGUARDS**

Lesaka will manage the security of its filing system to ensure that personal information is adequately protected. To this end, security controls will be implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification, or destruction.

Lesaka will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on Lesaka's IT network infrastructure.

Lesaka will ensure that all paper and electronic records comprising personal information are securely stored and made accessible only to authorised individuals.

All new employees will be required to sign employment contracts containing contractual terms for the use and storage of employee information. Confidentiality clauses will also be included to reduce the risk of unauthorised disclosures of personal information for which Lesaka is responsible.

All existing employees will, after the required consultation process has been followed, be required to sign an addendum to their employment contract containing the relevant consent and confidentiality clauses.

Lesaka's operators and third-party service providers will be required to enter into service level agreements with Lesaka where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement and agree to keep all personal information which Lesaka provides them access to with the utmost confidentiality and applying appropriate security safeguards to protect such personal information from loss or destruction.

## 7.9. DATA SUBJECT PARTICIPATION

A data subject may request the correction or deletion of his, her or its personal information held by Lesaka. Refer to section 6.2.

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## 8. PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES

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To the extent that Lesaka carries out direct marketing, it shall strive to observe, and comply with its obligations under POPIA when implementing principles and practices in relation to direct marketing.

Lesaka acknowledges that it may only use personal information to contact the data subject for purposes of direct marketing from time to time where it is permissible to do so.

It may use personal information to contact any data subject and/or market Lesaka 's services directly to the data subject(s) if the data subject is one of Lesaka 's existing clients, the data subject has requested to receive marketing material from Lesaka or Lesaka has the data subject's consent to market its services directly to the data subject.

If the data subject is an existing client, Lesaka will only use his/her/its personal information if it has obtained the personal information through the provision of a service to the data subject and only in relation to similar services to the ones Lesaka previously provided to the data subject.

Lesaka will ensure that a reasonable opportunity is given to the data subject to object to the use of their personal information for Lesaka 's marketing purposes when collecting the personal information and on the occasion of each communication to the data subject for purposes of direct marketing.

Lesaka will not use your personal information to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal information for marketing purposes, Lesaka shall do so. We encourage that such requests to opt-out of marketing be made via forms and links provided for that purpose in the marketing materials sent to you.

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## 9. RETENTION OF RECORDS

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Lesaka may keep records of the personal information it has collected, correspondence, or comments in an electronic or hardcopy file format.

In terms of POPIA, Lesaka may not retain personal information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances:

- Where the retention of the record is required or authorised by law;
- Lesaka requires the record to fulfil its lawful functions or activities;
- Retention of the record is required by a contract between the parties thereto;
- The data subject (or competent person, where the data subject is a child) has consented to such longer retention; or
- The record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.

Accordingly, Lesaka will, subject to the exceptions noted in this policy, retain personal information for as long as necessary to fulfil the purposes for which that personal information was collected and/or as permitted or required by applicable law.

Where Lesaka retains personal information for longer periods for statistical, historical or research purposes, Lesaka will ensure that appropriate safeguards have been put in place to ensure that all recorded personal information will continue to be processed in accordance with this policy and applicable laws.

Once the purpose for which the personal information was initially collected and processed no longer applies or becomes obsolete, Lesaka will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information. In instances where we de-identify your personal information, Lesaka may use such de-identified information indefinitely.

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## **10. DATA BREACHES**

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A data breach refers to any incident in terms of which reasonable grounds exist to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person.

Lesaka will address any data breach in accordance with the terms of POPIA and will notify the regulator and the affected data subject (unless the applicable law requires that we delay notification to the data subject) in writing in the event of a data breach (or a reasonable belief of a data breach) in respect of that data subject's personal information.

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## **11. WEBSITE COOKIES**

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Lesaka 's website uses cookies, which are small text files sent by a web server to store on a web browser. They are used to ensure websites function properly, store user preferences when needed and collect anonymous statistics on website usage.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website. If you accept a "cookie" or fail to deny the use of "cookies", you agree that we may use your personal information collected using "cookies" (subject to the provisions of this policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of our website.

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## **12. DUTIES AND RESPONSIBILITIES**

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### **12.1. LESAKA BOARD AND INFORMATION OFFICER**

Lesaka's Board and information officer are ultimately responsible for ensuring that Lesaka meets its legal obligations in terms of POPIA.

The information officer may delegate his/her responsibilities by appointing a Deputy Information Officer.

The Board is responsible for ensuring that:

- Lesaka registers and designates an information officer, and where necessary, a deputy information officer.

Once appointed, Lesaka will register the Information Officer with the Information Regulator prior to the performance of his or her duties.

Lesaka's Information Officer is entrusted with the following responsibilities in terms of Section 55(1) of POPIA and Regulation 4 of the Regulations made under Section 112(2) of POPIA.

**Section 55 (1) of POPIA:**

- encouraging compliance with conditions for the lawful processing of personal information;
- dealing with requests made pursuant to POPIA (presumably by the Information Regulator or data subjects);
- working with the Regulator in relation to investigations conducted related to prior authorizations;
- otherwise ensuring compliance by the body with the provisions of POPIA; and
- as may be prescribed.

**POPIA Regulation 4:**

An information officer must, in addition to the responsibilities referred to in section 55 (1) of the POPI Act, ensure that:

- a compliance framework is developed, implemented, monitored and maintained;
- a personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;
- a manual is developed, monitored, maintained and made available as prescribed in section 14 and 51 of the PAIA Act;
- internal measures are developed together with adequate systems to process requests for information or access thereto; and
- internal awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.
- Copies of the PAIA manual

Keeping the governing body updated about Lesaka's information protection responsibilities under POPIA. For instance, in the case of a security breach, the Information Officer must inform and advise the governing body of their obligations pursuant to POPIA.

All persons responsible for the processing of personal information on behalf of Lesaka:

- are appropriately trained and supervised to do so; and
- understand that they are contractually obligated to protect the personal information they come into contact with and are aware that a wilful or negligent breach of this policy's processes and procedures may lead to disciplinary action being taken against them.

**12.2. INFORMATION TECHNOLOGY (IT) DEPARTMENT**

Lesaka's IT department is responsible for:

- Ensuring that Lesaka's IT infrastructure, filing systems and any other devices used for processing personal information meet acceptable security standards.
- Ensuring that all electronically held personal information is kept only on designated drives and servers and uploaded only to approved cloud computing services.
- Ensuring that servers containing personal information are sited in a secure location, away from the general office space.
- Ensuring that all electronically stored personal information is backed-up and tested on a regular basis.

Approved by: Lesaka Board	Last revision date: March 2023 Version: 4	Date of next review: July 2023	Page 14 of 22
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- Ensuring that all back-ups containing personal information are protected from unauthorised access, accidental deletion, and malicious hacking attempts.
- Ensuring that personal information being transferred electronically is encrypted.
- Ensuring that all servers and computers containing personal information are protected by a firewall and the latest security software.
- Performing regular IT audits to ensure that the security of Lesaka’s hardware and software systems are functioning properly.
- Performing regular IT audits to verify whether electronically stored personal information has been accessed or acquired by any unauthorised persons.
- Performing a proper due diligence review prior to contracting with operators or any other third-party service providers to process personal information on Lesaka’s behalf. For instance, cloud computing services.

### 12.3. MARKETING DEPARTMENT

Lesaka’s Marketing department is responsible for:

- Approving and maintaining the protection of personal information statements and disclaimers that are displayed on Lesaka’s website, including those attached to communications such as emails and electronic newsletters.
- Addressing any personal information protection queries from journalists or media outlets such as newspapers.

Where necessary, working with persons acting on behalf of Lesaka to ensure that any outsourced marketing initiatives comply with POPIA.

### 12.4. EMPLOYEES AND OTHER PERSONS ACTING ON BEHALF OF LESAKA

Employees and other persons acting on behalf of Lesaka are required to treat personal information as a confidential business asset and to respect the privacy of data subjects.

Employees and other persons acting on behalf of Lesaka may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, any personal information, unless such information is already publicly known or the disclosure is necessary in order for the employee or person to perform his or her duties.

Employees and other persons acting on behalf of Lesaka must ensure that they comply with this policy.

### 13. RECORDS HELD BY LESAKA

The information is classified and grouped according to records relating to the following subjects and categories:

SUBJECT	CATEGORY * this list is not exhaustive
<b>Company Act Records</b>	<ul style="list-style-type: none"> <li>▪ All trust deeds;</li> <li>▪ Documents of Incorporation; Index of names of Directors; Memorandum of Incorporation;</li> <li>▪ Minutes of meetings of the Board of Directors; Minutes of meetings of Shareholders;</li> <li>▪ Proxy forms;</li> <li>▪ Register of debenture-holders;</li> <li>▪ Register of directors' shareholdings; Share certificates;</li> <li>▪ Records relating to the appointment of: Auditors; and</li> <li>▪ Directors; Prescribed Officer. Public Officer.</li> </ul>
<b>Financial Records</b>	<ul style="list-style-type: none"> <li>▪ Accounting Records;</li> <li>▪ Annual Financial Reports;</li> <li>▪ Annual Financial Statements Asset Registers;</li> <li>▪ Bank Statements;</li> <li>▪ Banking details and bank accounts;</li> <li>▪ Banking Records;</li> <li>▪ Debtors / Creditors statements and invoices; General ledgers and subsidiary ledgers; General reconciliation;</li> <li>▪ Invoices;</li> <li>▪ Paid Cheques;</li> <li>▪ Policies and procedures; Rental Agreements; and</li> <li>▪ Tax Returns.</li> </ul>
<b>Income Tax Records</b>	<ul style="list-style-type: none"> <li>▪ PAYE Records;</li> <li>▪ Documents issued to employees for income tax purposes;</li> <li>▪ Records of payments made to SARS on behalf of employees; and</li> <li>▪ All other statutory compliances:               <ul style="list-style-type: none"> <li>○ VAT;</li> <li>○ Regional Services Levies Skills Development Levies UIF; and</li> <li>○ Workmen's Compensation.</li> </ul> </li> </ul>
<b>Personnel Records</b>	<ul style="list-style-type: none"> <li>▪ Employment Contracts;</li> <li>▪ Employment Equity Plan Forms and Applications;</li> <li>▪ Grievance Procedures;</li> <li>▪ Leave Records;</li> <li>▪ Medical Aid Records;</li> <li>▪ Payroll reports;</li> <li>▪ Pension Fund Records;</li> <li>▪ Safety, Health and Environmental records;</li> <li>▪ Salary Records;</li> <li>▪ SETA records;</li> <li>▪ Standard letters and notices Training Manuals;</li> <li>▪ Training Records; and</li> <li>▪ Workplace and Union agreements and records.</li> </ul>
<b>Procurement Department</b>	<ul style="list-style-type: none"> <li>▪ Standard Terms and Conditions for supply of services and products;</li> <li>▪ Contractor, client, and supplier agreements;</li> <li>▪ Lists of suppliers, products, services, and distribution; and</li> <li>▪ Policies and Procedures.</li> </ul>

SUBJECT	CATEGORY * this list is not exhaustive
<b>Client Records</b>	<ul style="list-style-type: none"> <li>▪ Client details;</li> <li>▪ Credit application information; and</li> <li>▪ Information and records provided by a third party.</li> </ul>
<b>Marketing Department</b>	Advertising and promotional material.
<b>IT Department</b>	<ul style="list-style-type: none"> <li>▪ Computer/ mobile device usage policy documentation; Disaster recovery plans;</li> <li>▪ Hardware asset registers;</li> <li>▪ Information security policies/ standards/ procedures;</li> <li>▪ Information technology systems and user manuals;</li> <li>▪ Information usage policy documentation;</li> <li>▪ Project implementation plans; Software licensing; and</li> <li>▪ System documentation and manuals.</li> </ul>

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#### **14. POLICY REVIEW**

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The Audit Committee of the Company will periodically (preferably annually) review the policy and may recommend changes from time to time for the consideration of the Board.

Any proposed changes to this policy where indicated, shall be referred to the Board for appropriate action.



**PERSONAL INFORMATION REQUEST FORM**

**D. Signature Page**

Signature

Date



**POPIA COMPLAINT FORM**

**D. Signature Page**

Signature

Date